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Morristown, NJ 07960 0873 '99 SEP -3 A11 :45

August 24, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers La., Rm. 1061
Rockville, MD 20852

Re: docket nos. 98N-1230, 96P-0418, and 97P-0197

Dear FDA officials,

The Food and Drug Administration (FDA) is looking for ways to reduce salmonella in eggs and has asked for comments on the matter. Please consider my comments, which follow.

In its proposed rule, the FDA acknowledges that salmonellosis is a serious health concern and immediate action is needed due to the high number of outbreaks of foodborne illnesses and deaths caused by Salmonella enteritidis (Se) that are associated with the consumption of shell eggs. The two proposed actions, safe handling warning labels on egg cartons and regulation of egg refrigeration temperatures, do not adequately ensure that consumers are safeguarded from Se contamination.

Based on a recent report, the U.S. General Accounting Office concludes that refrigeration of eggs at 45 degrees Fahrenheit or below may not effectively reduce egg safety risks. The same report calls for the FDA to establish prevention-based procedures on egg farms. The elimination of induced (or forced) molting practices for egg-laying hens would be effective in decreasing the frequency and severity of Se infections in eggs. Based on a recent study, the U.S. Department of Agriculture (USDA) concludes that induced molting increases the frequency and severity of Se infections of a flock, regardless of an individual hen's age. The USDA believes that induced molting could alter the Se situation in a flock from a minor problem involving a small number of birds to one where a large number of birds are affected. A study at the University of Florida finds that stress caused by an induced molt significantly compromises the immune systems of laying hens, resulting in higher levels of Se infections. Moreover, the study concludes that induced molting is detrimental to the Se rate of the entire flock in that molted birds shed significantly higher numbers of Se during a forced molt as compared to unmolted birds. Induced molting causes an increase in the transmission of Se to uninfected hens housed in adjacent cages.

Clearly, the most effective and direct way to reduce Se infections in humans is to control outbreaks in egg-laying flocks, which transmit the infection to their eggs. The Food Safety and Inspection Service (FSIS) is encouraging poultry and egg producers to eliminate forced molting practices and adopt alternatives that reduce public health risks.

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In the proposed rule, the FDA states that "the ideal solution to this public health problem would be to adopt measures to eliminate viable Se in shell eggs." I strongly urge the FDA to use its jurisdiction to eliminate a farm practice that is injurious to both animal and human health by banning the practice of induced molting across the country.

Thank you for the opportunity to comment.

Sincerely,

K. Najwer-Coyle

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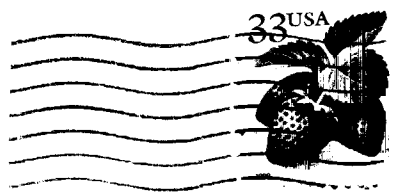

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CROSS FILE SHEET

File Number: 98N-1230/ C452

See File Number: 97P-0197/ C453

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